

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION		X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:  155616		X2) MULTIPLE CONSTRUCTION A. BUILDING 00 B. WING		X3) DATE SURVEY COMPLETED 06/19/2012	
NAME OF PROVIDER OR SUPPLIER  LANDMARK NURSING AND REHABILITATION				STREET ADDRESS, CITY, STATE, ZIP CODE 201 E ELM ST NEW ALBANY, IN 47150			
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F0000	<p>This visit was for the Post Survey Revisit (PSR) to the Investigation of Complaint IN00107210 completed on 5/1/12.</p> <p>Complaint IN00107210 - Corrected.</p> <p>Unrelated deficiency cited.</p> <p>Survey dates: June 18 and 19, 2012</p> <p>Facility number: 001145 Provider number: 155616 AIM number: 200120200</p> <p>Survey team: Jennie Bartelt, RN</p> <p>Census bed type: SNF/NF: 61 Residential: 26 Total: 87</p> <p>Census payor type: Medicare: 9 Medicaid: 43 Other: 35 Total: 87</p> <p>Sample: 7</p> <p>This deficiency also reflects state findings cited in accordance with 410 IAC 16.2.</p>			F0000	<p>Preparation and execution of this response and plan of correction does not constitute an admission or agreement by the provider of the truth of the facts alleged or conclusions set forth in the statement of deficiencies. The plan of correction is prepared and/or executed solely because it is required by the provisions of federal and state law. For purpose of any allegation that the facility is not in substantial compliance with federal requirements of participation, the response and plan of correction constitutes Landmark Nursing and Rehabilitation Center's allegation of compliance in accordance with Section 7305 in the State Operations Manual.</p>		

LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE

TITLE

(X6) DATE

Any deficiency statement ending with an asterisk (\*) denotes a deficiency which the institution may be excused from correcting providing it is determined that other safeguards provide sufficient protection to the patients. (see instructions.) Except for nursing homes, the findings stated above are disclosable 90 days following the date of survey whether or not a plan of correction is provided. For nursing homes, the above findings and plans of correction are disclosable 14 days following the date these documents are made available to the facility. If deficiencies are cited, an approved plan of correction is requisite to continued program participation.

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
CENTERS FOR MEDICARE & MEDICAID SERVICES

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OMB NO. 0938-0391

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	Quality review completed 6/22/12 Cathy Emswiller RN						

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F0329 SS=G	<p>483.25(I) DRUG REGIMEN IS FREE FROM UNNECESSARY DRUGS Each resident's drug regimen must be free from unnecessary drugs. An unnecessary drug is any drug when used in excessive dose (including duplicate therapy); or for excessive duration; or without adequate monitoring; or without adequate indications for its use; or in the presence of adverse consequences which indicate the dose should be reduced or discontinued; or any combinations of the reasons above.</p> <p>Based on a comprehensive assessment of a resident, the facility must ensure that residents who have not used antipsychotic drugs are not given these drugs unless antipsychotic drug therapy is necessary to treat a specific condition as diagnosed and documented in the clinical record; and residents who use antipsychotic drugs receive gradual dose reductions, and behavioral interventions, unless clinically contraindicated, in an effort to discontinue these drugs.</p> <p>Based on record review and interview, the facility failed to ensure residents receiving anticoagulant medication were monitored to ensure the necessity of the medication in the dose ordered for 2 of 4 residents reviewed related to anticoagulant medications in a sample of 7 residents. (Residents C and H) Resident C's coagulation times were not monitored, and he was hospitalized for diagnoses including rectal bleeding and Coumadin toxicity.</p>			F0329	<p><b>F329 DRUG REGIMEN IS FREE FROM UNNECESSARY DRUGS</b></p> <p>I. Resident C no longer resides in facility. Resident H has been assessed for any negative outcomes related to Coumadin therapy. The Physician has discontinued Coumadin order for Resident H on June 22, 2012, related to post-surgical utilization.</p> <p>II. All residents receiving Coumadin were reviewed, including PT/INR orders, antibiotic orders and</p>		07/02/2012

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	<p>Findings include:</p> <p>1. The clinical record for Resident C was reviewed on 6/18/12 at 1:50 p.m. The record indicated the resident was admitted to the facility on 5/8/12 after hospitalization.</p> <p>The hospital physician's Progress Notes, dated 5/8/12, included, but were not limited to "[arrow pointing up - increase] Coumadin." The hospital "Discharge/Transfer Medication Reconciliation Report, dated as printed 5/7/11 at 11:05 p.m., included, but was not limited to, Coumadin [anticoagulant] 4 mg by mouth daily, with a start date of 5/7/12. A line was drawn through the 4, and above the 4 was handwritten a 5. The report also included Keflex [antibiotic] 500 mg by mouth every 6 hours for 7 days, with a start date of 5/8/12. The hospital Discharge Summary, dictated 5/8/12, typed 5/8/12, and authenticated by the physician on 5/10/12 included, "...Clinical course: [name of resident]...was sent in here because of generalized weakness and was found to have increasing redness and cellulitis of his right leg. He had a hematoma at this site from trauma while on Coumadin and he was taken off of Coumadin, I believe, two months ago and then had an I&amp;D [incision and drainage]done on the leg for</p>		<p>current medications. The Physician was notified for all Residents receiving Coumadin.</p> <p>III. The Management of Coumadin Therapy Policy has been reviewed and revised. The policy was reviewed and the revision was approved by the Medical Director. A Coumadin/Medication Alert was created, reviewed and approved by the Medical Director. The Coumadin/Medication Alert was completed for each Resident, and will continue to be completed for any new applicable Resident. The Coumadin/Medication Alert was placed in each Resident's Medical Record that is receiving Coumadin located in front of the Physician order section.</p> <p>All nurses will be in-serviced on the revised Management of Coumadin Therapy Policy and the new Coumadin/Medication Alert system by July 2, 2012.</p> <p>IV. A Coumadin Management Audit Tool was created and will be utilized, daily, to review PT/INR results, Coumadin dosage, frequency of labs and follow-up lab date on an on-going basis. The Coumadin Management Audit Tool will review PT/INR results, Coumadin dosage, frequency of labs and follow-up lab date. This audit will</p>				

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	<p>hematoma....Cardiology was consulted because of anticoagulation issues, and [name of cardiologist] felt strongly that he ought to be back on Coumadin. Therefore, this was gradually restarted. His INR [International Normalized Ratio - measurement related to clotting time] slowly edged up to 1.4, but will need to be monitored closely, and Coumadin dose needs to be adjusted until INR is between 2 -3 and regulated...." The note indicated the resident would be discharged to the facility for follow-up with the physician there.</p> <p>Physician's orders upon admission on 5/8/12, included, but were not limited to, Baby Aspirin [antiplatelet] 81 mg, one by mouth daily; Keflex 500 mg, one by mouth daily; and Coumadin 5 mg, one by mouth at 4:00 p.m. The orders also indicated PT/INR [Protime/International Normalized Ratio] due 5/10/12.</p> <p>On 5/9/12, a physician's order was received for "Flagyl [antifungal for treatment of C. difficile diarrhea] 500 mg, one by mouth 3 times daily for 10 days."</p>		<p>be completed on all Residents with current Coumadin orders. The DON, ADON and/or designee will continue to audit those residents receiving Coumadin daily for 2 weeks, weekly for 2 weeks, monthly for 2 months and then quarterly. The Director of Nursing or designee will review all new orders to identify new antibiotic orders and proper follow through. The Director of Nursing will report to QA committee weekly for four weeks, monthly for two months and quarterly thereafter. Any areas of concern will be addressed, immediately. Audits will be reviewed by the QA committee on a monthly basis to ensure compliance.</p> <p>V. Date of Completion: July 2, 2012</p>				

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	<p>The Medication Administration Record</p> <p>indicated the resident received the</p> <p>following medications as indicated on the</p> <p>admission orders from 5/9/12 through</p> <p>5/19/12: Coumadin, aspirin, Flagyl, and</p> <p>Keflex. The Medication Administration</p> <p>Record indicated the resident received</p> <p>Norco 4 times daily from 5/15/12 through</p> <p>5/19/12.</p> <p>The Medication Administration Record</p> <p>for May 2012 indicated on 5/14/12, the</p> <p>resident's pain medication, Norco 5/325</p> <p>(hydrocodone/acetaminophen -</p> <p>narcotic/analgesic pain medication] was</p> <p>changed from administration as needed to</p> <p>4 times daily.</p> <p>On 6/19/12 at 8:30 p.m., review at the</p> <p>website <a href="http://packageinserts.bms.com/pi/pi_coumadin.pdf">http://packageinserts.bms.com/pi/pi_coumadin.pdf</a> included, but was not</p> <p>limited to, the following from the package</p> <p>insert for Coumadin: "...Warning:</p> <p>Bleeding Risk: Coumadin can cause</p>						

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	<p>major or fatal bleeding; Perform regular monitoring of INR in all treated patients; Drugs, dietary changes, and other factors affect INR levels achieved with Coumadin therapy....Drug Interactions: ...Drugs that increase bleeding risk: Closely monitor patients receiving any such drug (e.g. ...antiplatelet agents...); Antibiotics and antifungals: Closely monitor INR when initiating or stopping an antibiotic or antifungal course of therapy...."</p> <p>Review of the Geriatric Drug Handbook, 12th edition, indicated in the Drug Interactions Substrate for Warfarin (Coumadin), "Acetaminophen: May enhance the anticoagulant effect of warfarin. Most likely to occur with daily acetaminophen doses &gt;1.3 g for &gt; 1 week."</p> <p>Lab results for a Protime/INR for a blood specimen collected and reported 5/10/12 indicated: "Protime 19.7 H [high]" with Normal Range of 9.5 - 11.8 seconds and "INR 1.9 H" with 0.9 - 1.1 for the Normal Range. The report indicated, "Standard</p>						

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	<p>Anticoagulant: 2.0-3.0 INR" and</p> <p>"Aggressive Anticoagulant: 2.5 - 3.5</p> <p>INR." Handwritten on the lab was</p> <p>"Coumadin 5 mg 1 po [by mouth] 4:00</p> <p>p.m. daily." A stamp mark indicating</p> <p>"Faxed" was on the report, with the date</p> <p>of 5/10/12 and initials handwritten in a</p> <p>blank on the stamp mark. No notation on</p> <p>the lab report indicated the physician had</p> <p>reviewed the report. Nurse's Notes for</p> <p>5/10/12 and 5/11/12 lacked</p> <p>documentation of follow-up with the</p> <p>physician related to the PT/INR report.</p> <p>The "History and Physical" note by the</p> <p>resident's attending physician, dated with</p> <p>date of service, dictation date, and</p>						



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	<p>received date of 5/11/12, included, but</p> <p>was not limited to, "...Past medical</p> <p>history: ...Chronic</p> <p>Anti-coagulation...MAR [Medication</p> <p>Administration Record, labs, and hospital</p> <p>records have been reviewed there are no</p> <p>acute findings....Assessment and Plan...At</p> <p>this time, we will make no changes to the</p> <p>patient's current medication regimen with</p> <p>the exception of adding a PRN [as</p> <p>needed] pain medication. He does plan</p> <p>on returning home soon." During</p> <p>interview on 6/19/12 at 9:15 a.m., the</p> <p>Director of Nursing indicated the</p> <p>physician "would have seen that lab</p> <p>[dated 5/10/12]," and "did not change any</p> <p>orders" for the medication dose and</p>						

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	<p>further monitoring o PT/INR related to</p> <p>the recently increased dose o Coumadin.</p> <p>The Interdisciplinary Plan of Care, dated 5/18/12, for "Anticoagulation" indicated, "Resident is at risk for abnormal bleeding or hemorrhage because of anticoagulant usage." Goals were, "Resident will be free from signs and symptoms of abnormal bleeding through the next review date," and "Resident's PT and INF [sic] will be maintained within therapeutic range, as determined by their physician through the next review date."</p> <p>Approaches included, but were not limited to, "Schedule lab test as ordered by the physician to monitor coagulation</p>						

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	<p>factors - report results to physician."</p> <p>During interview on 6/18/12 at 3:40 p.m.,</p> <p>the Assistant Director of Nursing</p> <p>(ADON) provided a copy of her Lab</p> <p>Tracking Log. She indicated she used the</p> <p>log to ensure all ordered labs were</p> <p>completed and reported to the physician.</p> <p>She indicated the log showed with check</p> <p>marks that on 5/10/12, Resident C's lab</p> <p>specimen for PT/INR was picked up,</p> <p>results received, and the physician was</p> <p>notified. In the column for "Orders" was</p> <p>handwritten "NO," and the initials of the</p> <p>ADON were in the column for</p> <p>"Comments." The ADON indicated she</p> <p>usually talks to the physician's nurse</p>						

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	<p>practitioner about labs, and she indicated</p> <p>no note was in the clinical record to</p> <p>indicate contact with the physician about</p> <p>the PT/INR for 5/10/12. The ADON</p> <p>indicated no orders were received related</p> <p>to further monitoring of the resident's</p> <p>PT/INR.</p> <p>During interview at this same time, the</p> <p>Director of Nursing (DON) in regard to</p> <p>monitoring labs for residents on</p> <p>Coumadin, "We have to draw PT/INR</p> <p>when the physician orders it."</p> <p>On 5/20/12 at 9:08 a.m., a physician's</p> <p>order indicated, "Send to [initials of local</p> <p>hospital] for eval [evaluation]."</p>						

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	<p>The Emergency Department report, dated 5/20/12, indicated, "History of Present Illness: The patient...complains of rectal bleeding and generalized weakness. He states it developed over the past 12 hours. He denies other complaints....Physical Exam: Rectal: The patient does have bright red blood per rectum....Emergency Room Course: The patient was typed and screened, also was given intravenous fluids and normal saline 500-milliliter bolus....He was given fresh frozen plasma 4 units IV [intravenous]. Disposition: The patient will be admitted to the hospital with diagnosis of rectal bleeding, Coumadin toxicity...."</p>						

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	<p>A lab report for PT/INR collected on  5/20/12 at 11:15 a.m. indicated, "PT  Range 9.3-11.7 sec: H &gt;120 INR &gt;13.1."  A footnote indicated the result was called  to the emergency room physician on  5/20/12 at 11:37 a.m.</p> <p>The hospital History and Physical, dated  5/20/12, indicated, "Reason for  Admission: Severe nausea, vomiting,  bilious emesis, loose stools, abdominal  pain in the epigastrium, Hematemesis and  hematochezia earlier today. Problem List:  Acute Coumadin toxicity, iatrogenic,  recently started on Coumadin therapy in  the hospital during [sic] his last admission</p>						

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STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION		X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:  155616		X2) MULTIPLE CONSTRUCTION A. BUILDING 00 B. WING		X3) DATE SURVEY COMPLETED 06/19/2012	
NAME OF PROVIDER OR SUPPLIER  LANDMARK NURSING AND REHABILITATION				STREET ADDRESS, CITY, STATE, ZIP CODE 201 E ELM ST NEW ALBANY, IN 47150			
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	<p>after consulting with Cardiology....History</p> <p>of Present Illness: ...The patient was</p> <p>discharged to the nursing home for</p> <p>continuation of Coumadin therapy.</p> <p>Apparently, but I am not sure about this,</p> <p>the patient has not had a recent PT and</p> <p>INR until today when he complained of</p> <p>some Hematemesis. He also had some</p> <p>bright red blood per rectum. The nursing</p> <p>home room [sic], because of nausea and</p> <p>vomiting, and other complaints, decided</p> <p>to send him to the emergency room for</p> <p>further evaluation, from where he is</p> <p>admitted to our service for further</p> <p>management....Assessment:....now</p> <p>coming in with coagulopathy of 13,</p> <p>although he has been on antibiotics,</p>						

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	<p>which may have led to part of this</p> <p>problem....My recommendations will be</p> <p>to hold off on Coumadin therapy for now.</p> <p>We will reverse the coagulopathy with</p> <p>fresh frozen plasma. He has received 4</p> <p>units already. We will give some vitamin</p> <p>K subcutaneously now. We will ask</p> <p>Gastroenterology to see him. We will ask</p> <p>Cardiology to address the issue of</p> <p>Coumadin therapy resumption...."</p> <p>2. The clinical record for Resident H was</p> <p>reviewed 6/19/12 at 11:20 a.m. The</p> <p>record indicated the resident was admitted</p> <p>on 5/3/12 with diagnoses including, but</p> <p>not limited to, fracture of right hip.</p>						



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	<p>Physician's orders, dated 5/3/12, included,</p> <p>but were not limited to, "Coumadin 7 mg</p> <p>1 po [by mouth] qd [daily] X [times] 1 wk</p> <p>[week]" and "PT/INR daily."</p> <p>A lab report, dated 5/4/12, indicated,</p> <p>Prottime of 20 - high (normal range 9.5 -</p> <p>11.8) and INR 2.0 - high (normal range</p> <p>0.9 - 1.1). A handwritten notation on the</p> <p>lab report form, signed by the Nurse</p> <p>Practitioner on 5/5/12, indicated, "1. Cont</p> <p>[continue] same dose. 2. Re [check mark]</p> <p>2 weeks 5/16/12 fax results to office."</p> <p>A physician's order, dated 5/5/12</p> <p>(untimed), indicated, "T.O. [telephone</p> <p>order] [name of Nurse Practitioner] Re</p>						

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	<p>[check mark] PT/INR 5/16/12 continue same dose (7 mg)."</p> <p>A lab report, dated 5/5/12, indicated, Protime 25.5 - high (reference range - 10.0 - 25.0) and INR 2.3 - high (reference range 0.9 - 1.1). An unsigned, handwritten notation on the report indicated, "N.O. [new order] Re [check mark] PT/INR 5/16/12 cont current dose 5/5/12." A stamp mark indicating "Faxed" was on the report, with the date of 5/5/12. No initials indicated who had faxed the report. Documentation on the lab report and in the nurse's notes failed to indicate the physician's order dated 5/5/12 was confirmed after the PT/INR report on</p>						

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	<p>5/5/12.</p> <p>Nurse's Notes for 5/12/12 at 6:00 p.m., indicated, "New orders received et [and] noted to draw INR today when lab comes. Coumadin 7mg cont [continues] @ 4 p.m. daily...." Documentation in the Nurse's Notes failed to indicate information related to the reason for the PT/INR at this time. Nurse's Notes indicated the lab was drawn on 5/12/12 at 7:00 p.m.</p> <p>During interview on 6/19/12 at 2:45 p.m., the DON indicated the record did not indicate why the PT/INR was ordered on the evening of 6/12/12.</p>						

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	<p>A lab report, dated 5/12/12 at 11:51 p.m., indicated, Prottime 45.1 - high (reference range 10.0 - 12.5) and INR 4.1 - critical (reference range 0.9 - 1.1). A footnote for the INR 4.1 indicated, "Critical value(s) called to, repeated, and verified by [name] @ 2336 [11:36 p.m.] on 5/12/12 by [identifier number]"</p> <p>A handwritten notation on the lab report indicated, "Hold Coumadin X 2 Check INR on day 3 as per [name of Nurse Practitioner] 5/13/12 12:45 a.m." A physician's telephone order, dated 5/13/12 at 12:45 a.m., indicated, "Hold Coumadin X 2 days due to critical INR level. Recheck INR on days 5/15/12."</p>						

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	<p>The Medication Administration Record</p> <p>for May 2012 indicated next to the entry</p> <p>for "Coumadin 7 mg 1 po qd:" the nurse's</p> <p>initials for the dose for 5/12/12 was</p> <p>circled, but no documentation on the</p> <p>reverse of the form indicated information</p> <p>related to the medication on that date. A</p> <p>box was drawn around the dates of 5/13</p> <p>and 5/14/12, with the word "hold"</p> <p>handwritten in. Documentation indicated</p> <p>the resident received the 7 mg dose from</p> <p>5/16 through 5/31/12.</p> <p>Lab reports and Nurse's Notes failed to</p> <p>indicate the PT/INR was checked as</p> <p>ordered on 5/15/12 (based on the order of</p>						

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	<p>5/13/12) and 5/16/12 (based on the order of 5/5/12).</p> <p>Undated and handwritten on the Medication Administration Record for May 2012 was the following entry; however, no physician's order was documented for this: "PT/INR 3 days Coumadin on hold 5/15 &amp; 5/16, re [check mark] 5/17."</p> <p>During interview on 6/19/12 at 3:55 p.m., the Assistant Director of Nursing indicated the PT/INR was not drawn on 5/15 and 5/16/12.</p> <p>A lab report, dated 5/17/12, indicated</p>						

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	<p>Protime 26.8 - high (normal range 9.5 - 11.8) and INR 2.6 - high (0.9 - 1.1). An unsigned, handwritten on the report was,</p> <p>"Restarted Coumadin 7 mg on 5/15</p> <p>Coumadin held 5/12 - 5/13 - 5/14."</p> <p>Documentation in the Nurse's Notes failed to indicate follow-up with the physician related to the lab. An unsigned, handwritten notation on the lower right corner of the report indicated, "Noted 5/24/12." A handwritten notation, signed by the Nurse Practitioner on 5/25/12, indicated, "1. Cont [continue] same dose.</p> <p>2. Re [check mark] one month."</p> <p>A physician's order, dated 5/24/12, indicated, "Repeat PT/INR on 6/17/12."</p>						

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	<p>Nurse's Notes for 6/4/12 at 6:00 p.m.,  indicated, "NP [Nurse Practitioner] here  [symbol for with] n.o. received and  noted."</p> <p>A physician's order, dated 6/4/12,  indicated to recheck the INR on 6/5/12.</p> <p>A lab report, dated 6/5/12, indicated  Protime - 64.5 - high and INR 6.3 -  critical high. A physician's order, dated  6/5/12, indicated to hold the Coumadin on  6/5 and 6/6/12, and recheck the PT/INR  on 6/7/12. A lab report, dated 6/7/12,  indicated Protime 66.4 - high and INR 6.5  - critical high. A physician's order, dated  6/7/12, indicated to hold the Coumadin on</p>						



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	<p>6/7 and 6/8/12 related to increased</p> <p>PT/INR and recheck the PT/INR on</p> <p>6/9/12. A lab report, dated 6/9/12,</p> <p>indicated Prottime 18.5 - high and INR</p> <p>1.8.</p> <p>A physician's order, dated 6/10/12,</p> <p>indicated, "D/C [discontinue] previous</p> <p>Coumadin 7 mg; Start Coumadin 5 mg po</p> <p>q [every] daily. Recheck PT/INR in 3</p> <p>days."</p> <p>A lab report, dated 6/13/12, indicated</p> <p>Prottime 12.0 - high and INR 1.2 - high.</p> <p>Unsigned, handwritten notations on the</p> <p>lab report indicated, "Coumadin dc'd</p> <p>[discontinued] on 6/10/12" and "Cont</p>						

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	<p>[continue] coumadin 5 mg q day."</p> <p>Documentation in physician's orders, nurse's notes, and on the lab reports failed to indicate a physician's order had been received for further monitoring of the resident's PT/INR.</p> <p>During interview on 6/19/12 (Tuesday) at 2:45 p.m. in regard to the facility's plan for further monitoring of the resident's PT/INR, since the Coumadin dose had been changed, the DON indicated the facility would follow the doctor's orders.</p> <p>When interviewed as to when the physician would visit Resident H again to possibly write orders, the DON indicated</p>						

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	<p>the Nurse Practitioner visits the facility on</p> <p>Mondays, but was not present on</p> <p>Monday, 6/18/12, due to illness. She</p> <p>indicated the Nurse Practitioner would</p> <p>probably not visit again until the</p> <p>following Monday, 6/25/12.</p> <p>3.1-48(a)(3)</p>						

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